

IN THE DISTRICT COURT OF THE UNITED STATES
DISTRICT OF SOUTH CAROLINA
GREENVILLE DIVISION

UNITED STATES OF AMERICA)	CRIMINAL NO.: _____
)	
)	18 U.S.C. § 1955
vs.)	18 U.S.C. § 981(a)(1)(C)
)	18 U.S.C. § 1955(d)
)	28 U.S.C. § 2461(c)
BUBBA TECHNOLOGY GROUP, LLC)	
)	INFORMATION

COUNT 1
(Operation of an Illegal Gambling Business)

THE UNITED STATES ATTORNEY CHARGES:

At all times material to this Information:

1. That beginning at a date unknown to the United States Attorney but from at least in or around January 2017 and continuing thereafter up to and including June 2021, the exact dates being unknown to the United States Attorney, in the District of South Carolina and elsewhere, the Defendant, **BUBBA TECHNOLOGY GROUP, LLC**, together with others known and unknown to the U.S. Attorney, unlawfully and knowingly did conduct, finance, manage, supervise, direct, and own an illegal gambling business that was in violation of the laws of the States in which the business was conducted, including but not limited to the keeping and operating of unlicensed video gaming machines used in violation of S.C. Code Ann. § 12-21-2710.

2. And which illegal gambling business in violation of the laws of the State of South Carolina had the following characteristics:

- a. said business involved five or more persons who conducted, financed, managed, supervised, directed, and owned all or part of said business; and
- b. said business was in substantially continuous operation for a period in excess of thirty days and had a gross revenue of \$2,000 on any single day.

In violation of Title 18, United States Code, Sections 1955 and 2.

FORFEITURE

OPERATION OF AN ILLEGAL GAMBLING BUSINESS:

Upon conviction for violation of Title 18, United States Code, Section 1955, as charged in this Information, the Defendants, **BUBBA TECHNOLOGY GROUP, LLC**, shall forfeit to the United States, all of the Defendants' rights, title, and interest in any property, real and personal, which constitutes, is derived from, or is traceable to proceeds the Defendants obtained, directly or indirectly, as the result of such violation, and any property used or intended to be used, in any manner or part, to commit or facilitate the commission of the offense.

PROPERTY:

Pursuant to 18 U.S.C. §§ 981(a)(1)(C) and 1955(d), and 28 U.S.C. § 2461(c), the property which is subject to forfeiture upon conviction of the Defendants for the violation charged in this Information includes, but is not limited to, the following:

A. Proceeds / Forfeiture Judgment:

A sum of money equal to all proceeds the Defendants obtained directly or indirectly from the offense charged in this Information, that is, a minimum of \$150,000.00 in United States currency, and all interest and proceeds traceable thereto, and/or that such sum equals all property derived from or traceable to their violation of 18 U.S.C. § 1955.

B. Bank Accounts:

(a) \$16,718.26 in Truist Account number x5833
In the name of: Southland Consultants, LLC

(b) \$200,321.17 in TD Bank Account number x5814
In the name of: Bubba Technology Group, LLC

C. Cash/United States Currency:

\$150,000.00 in United States currency to be remitted to the Government by the Defendants.

SUBSTITUTE ASSETS:

If any of the property described above as being subject to forfeiture to the United States, as a result of any act or omission of the Defendants,

- (1) Cannot be located upon the exercise of due diligence;
- (2) Has been transferred or sold to, or deposited with a third party;
- (3) Has been placed beyond the jurisdiction of the Court;
- (4) Has been substantially diminished in value; or
- (5) Has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 18, United States Code, Sections 982(b)(1), [incorporating Title 21, United States Code, Section 853(p)], to seek forfeiture of any other property of the said Defendants up to the value of the above forfeitable property.

Pursuant to Title 18, United States Code, Sections 981(a)(1)(C) and 1955(d), and Title 28, United States Code, Section 2461(c).

ADAIR F. BURGESS
UNITED STATES ATTORNEY

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